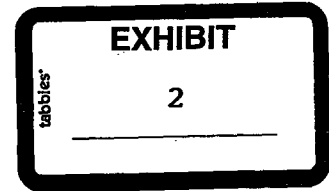


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION



A.B.S., et al.,
Plaintiff,

vs.

MAYOR FRANCIS SLAY, et al.
Defendants.

Case No. 4:12-CV-202 JCH

**NOTICE TO TAKE DEPOSITION OF CHRISTINA WILSON
AND REQUEST TO PRODUCE DOCUMENTS AND TANGIBLE THINGS
AT THE DEPOSITION**

**TO: Albert S. Watkins
Michael D. Schwade
R. Jackson Horan, Jr.
7800 Forsyth Boulevard, Suite 700
Clayton, MO 63105**

**Attorneys for Plaintiff
A.B.S.**

PLEASE TAKE NOTICE that on July 26, 2013 beginning at 1:30 p.m. and continuing thereafter pursuant to Rule 30 of the Federal Rules of Civil Procedure, at the law offices of Schottel & Associates, P.C., 906 Olive St., PH, St. Louis, MO 63101, the deposition of Christina Wilson, will be taken, to be used in the above-captioned matter on part of the Intervenor Plaintiff Annie Smith; testimony is to be recorded by stenographic means.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(b)(2) of the Federal Rules of Civil Procedure, the deponent Christina Wilson is requested to produce documents and tangible things at the deposition as designated in Exhibit 1 attached to this notice.

SCHOTTEL & ASSOCIATES, P.C.

BY: 

James W. Schottel, Jr. #51285MO
906 Olive St., PH
St. Louis, MO 63101
(314) 421-0350
(314) 421-4060 facsimile
jwsj@schotteljustice.com

Attorney for Intervenor Plaintiff
Annie Smith

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was mailed first-class, postage prepaid to the following
on this 5th day of July, 2013.

Albert S. Watkins
Michael D. Schwade
R. Jackson Horan, Jr.
7800 Forsyth Boulevard, Suite 700
Clayton, MO 63105

Attorneys for Plaintiff
A.B.S.

Robert J. Isaacson
Assistant Attorney General
P.O. Box 861
St. Louis, MO 63188

Attorney for Defendants



EXHIBIT 1

Pursuant to Rule 30(b)(2) of the Federal Rules of Civil Procedure, the deponent Christina Wilson is requested to produce documents and tangible things at the deposition as follows:

1. All state and federal tax returns and documents filed by you with the State of Missouri or the United States Internal Revenue Service for the years 2009, 2010, 2011 and 2012 (If these items are not in your possession, please complete and execute the attached Mo. Dept. of Rev. Form 1937 and I.R.S. Form 4506 and bring to the scheduled deposition).

2. All documents reflecting on, referring to, or relating to money received by you, from a life insurance policy as a result of the death of Anthony Lamar Smith.

3. All documents relating to any source of income other than employment; such as rent, interest, dividends, Social Security, TANF, VA Benefits, food stamps, pensions, annuities, lottery winnings, etc. from the period of January 1, 2009 to current.

4. All documents reflecting on, referring to, or relating to state or federal governmental financial assistant for the benefit of the minor child, A.B.S.

5. All bank statements in your possession of any joint checking or joint savings account held with Anthony Lamar Smith from the period of January 1, 2009 to current.

6. All leases or documents evidencing your residency from January 1, 2009 to current.

7. A copy of your most recent pay stub from employment.
8. Your current Missouri Driver License or Missouri Nondriver License (ID Card).
9. All documents reflecting on, referring to, or relating to expenses incurred by you as a result of the death of Anthony Lamar Smith.